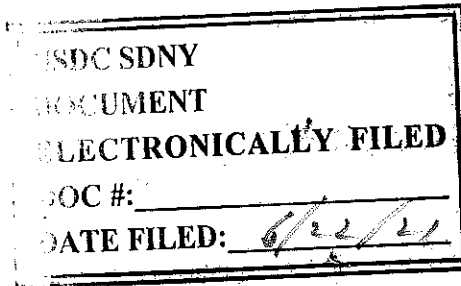


# BRACEWELL

June 21, 2021

MEMO ENDORSED

Honorable Lewis A. Kaplan  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312



VIA ECF

Re: United States v. Abdel-Wadood, 19 Cr. 233

Dear Judge Kaplan:

I write to request a modification of Mustafa Abdel-Wadood's bail conditions, to which the government has consented.

At present, Mr. Abdel-Wadood is at liberty on a \$10 million bond, signed by four co-signors and secured by two properties, each with equity of more than \$5 million. One of those properties, which is owned by one of the co-signors, is an apartment at 151 East 58th Street, Apt. 48B, New York, New York. The co-signor would like to sell the apartment, and a buyer has been identified. The sale, however, cannot be consummated unless the confession of judgment filed against the apartment is satisfied. The proposed modification is to remove the apartment from the collateral securing the bond, leaving the four co-signors in place, along with one property, a home on Long Island, worth \$7.5 million net of mortgages.

As the Court knows, Mr. Abdel-Wadood has been released on bail since late May 2019. In that more than two-year period, he has been fully compliant with the conditions of his

Paul Shechtman  
Partner

T: +1.212.508.6107 F: +1.800.404.3970  
1251 Avenue of the Americas, 49th Floor, New York, New York 10020-1100  
paul.shechtman@bracewell.com bracewell.com

AUSTIN CONNECTICUT DALLAS DUBAI HOUSTON LONDON NEW YORK SAN ANTONIO SEATTLE WASHINGTON, DC

## BRACEWELL

June 21, 2021  
Page 2

release. His Pre-Trial Services Officer, DayShawn Bostic, considers him a model releasee. His geographic limits have been extended from the building where he initially resided to the Southern and Eastern Districts of New York with travel to Washington, D.C., where his son is in college. The ankle bracelet that he was originally required to wear has long been removed. He is here (and intends to stay here) until the lead defendant in his case is extradited from England to the Southern District for trial. That has proven to be a protracted process.

As noted, the government agrees that a confession of judgment on the 58th Street apartment is no longer necessary to ensure Mr. Abdel-Wadood's presence. The proposed modification reflects that fact.

Respectfully submitted,

/s/ Paul Shechtman

Paul Shechtman

PS:wr

cc: AUSA Andrew Thomas  
P.O. DayShawn Bostic

*Granted*

SO ORDERED

*Lewis A. Kaplan*  
LEWIS A. KAPLAN, USDJ

*6/22/21*